

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROBERT SYLVESTER KELLY, aka
“R. Kelly,”
DERREL McDAVID, and
MILTON BROWN, aka “June Brown”

Case No. 19 CR 567

Honorable Harry D. Leinenweber

**SUPPLEMENT TO THE GOVERNMENT’S PROPOSED
JURY INSTRUCTIONS**

The United States of America, by its attorney, John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, hereby submits a supplement to the government’s proposed jury instructions. The government’s initial set of proposed instructions was filed on August 4, 2022. R. 251. Because the government based its submissions on the anticipated trial evidence, the government may ask this Court for permission to supplement or modify the proposed jury instructions, as appropriate.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

By: /s/ Elizabeth R. Pozolo
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“Any facility or means of interstate or foreign commerce” includes a landline or cellular telephone. A person who makes or receives a telephone call using a landline or cellular telephone uses a facility or means of interstate commerce.

Government Instruction No. 45

United States v. Richeson, 338 F.3d 653 (7th Cir. 2003)

United States v. Mandel, 657 F.3d 710 (7th Cir. 2011)

United States v. Burke, 2022 WL 1970189 (N.D. Ill. June 6, 2022)